

## Remarks

### I. Introduction

This is in response to the final Office Action dated February 24, 2009 and is being submitted simultaneously with a Request for Continued Examination pursuant to 37 C.F.R. § 1.114.

The Office Action rejected claims 1, 9-11, 13, 20, 35, 43, and 44 under 35 U.S.C. §103(a) as being unpatentable over United States Patent No. 6,834,370 (Brandl) in view of United States Publication No. 2001/0056429 (Moore). The Office Action rejected claims 2-4, 8, 12, 14, 15, 18, 19, and 23-27 under 35 U.S.C. §103(a) as being unpatentable over Brandl and Moore in view of United States Patent No. 6,996,589 (Jayram). The Office Action rejected claim 5 under 35 U.S.C. §103(a) as being unpatentable over Brandl and Moore in view of United States Patent No. 6,289,266 (Payson). The Office Action rejected claim 6 under 35 U.S.C. §103(a) as being unpatentable over Brandl and Moore in view of United States Publication No. 2001/0047420 (Talanis). The Office Action rejected claim 7 under 35 U.S.C. §103(a) as being unpatentable over Brandl and Moore in view of Mylopoulos, "Knowbel: A Hybrid Tool for Building Expert Systems" (Mylopoulos). The Office Action rejected claims 16 and 17 under 35 U.S.C. §103(a) as being unpatentable over Brandl and Moore in view of United States Publication No. 2002/0026633 (Koizumi) and Jayram. The Office Action rejected claims 21, 28-33, and 36-39 under 35 U.S.C. §103(a) as being unpatentable over Brandl and Moore in view of United States Publication No. 2002/0077711 (Nixon). The Office Action rejected claim 22 under 35 U.S.C. §103(a) as being unpatentable over Brandl and Moore in view of Koizumi and United States Publication No. 2002/0055804 (Betawar). The Office Action rejected claim 34 under 35 U.S.C. §103(a) as being unpatentable over Brandl and Moore in view of Koizumi. The Office Action rejected claims 40-42 under 35 U.S.C. §103(a) as being unpatentable over Brandl and Moore in view of Betawar. The Office Action rejected claim 45 under 35 U.S.C. §103(a) as being unpatentable over Brandl and Moore in view of Hill, "Yahoo for Dummies" (Hill).

Claims 1, 43, and 44 have been amended. No new matter has been added. Claims 1-44 and 46 are pending.

## II. Rejections under 35 U.S.C. §103

Independent claims 1, 43, and 44 were rejected under 35 U.S.C. §103(a) as being unpatentable over Brandl in view of Moore. In order to “establish *prima facie* obviousness of a claimed invention, all claim limitations must be taught or suggested by the prior art.” *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). Furthermore, “all words in a claim must be considered in judging the patentability of that claim against the prior art.” *In re Wilson*, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970). See also MPEP § 2143.03. The cited art does not teach or suggest all of the claim limitations of independent claims 1, 43, and 44. Therefore, Applicants request the withdrawal of the rejection under 35 U.S.C. §103(a).

The present invention relates to translating source information into target information using knowledge that arises from relationships between the elements of the source information. As described at paragraph [19] of the specification, configuration information is obtained from a source system, such as a biopharmaceutical batch system. This configuration information can be transformed, for example, into configuration information of a target system. As described at paragraph [15], in addition to translating existing configuration information from a source system to configuration information of a target system, embodiments of the present invention are capable of identifying patterns in the configuration information, relating these patterns to corresponding domain concepts, and generating configuration information in the target system or document that encodes the domain concepts. Accordingly, configuration information can be generated in the target system based on inferred relationships identified in the configuration information in the source system. This can preserve knowledge that is inherent in the source system.

This aspect of the present invention is reflected in independent claim 1, as amended. In particular, independent claim 1 has been amended to recite the limitation "automatically identifying patterns in the configuration information, inferring relationships between the patterns and corresponding domain concepts, and generating configuration information that encodes the domain concepts". Independent claims 43 and 44 have been similarly amended.

The cited art, separately or in combination, does not disclose this limitation of independent claim 1.

Brandl is directed to a method for creating master recipes from a general recipe. In particular, the method of Brandl automatically generates a site specific master recipe for manufacturing a product from a generic general recipe based on a specific set of equipment available. The general recipe of Brandl contains a set of process actions that are independent of equipment. Each process action has one or more corresponding recipe segments that can be used to implement that process action on certain equipment. The method of Brandl generates the master recipe for a process cell by determining, based on the equipment available in a process cell, which recipe segments to use to implement the process actions of the general recipe.

The Office action alleges that "obtaining a first transformed version of the configuration information" is disclosed in Brandl because Brandl provides a method for "automatically creating a set of master recipes from general recipe using site information". Accordingly, the Examiner appears to be asserting that the general recipe is the "configuration information" and the master recipes are the "first transformed version of the configuration information". However, there is no description in Brandl of identifying patterns in the generic recipe, inferring relationships between the patterns identifies in the generic recipe and corresponding domain concepts, and generating additional information in the master recipe to encode these domain concepts. Therefore, Brandl fails to disclose "automatically identifying patterns in the configuration information, inferring relationships between the patterns and corresponding domain concepts, and generating configuration information that encodes the domain concepts,"

as recited in independent claim 1, as amended. Further, Moore fails to cure this deficiency of Brandl. Thus, neither Brandl nor Moore, separately or in combination, disclose this limitation of amended independent claim 1.

Furthermore, independent claim 1 requires two translations of the configuration information, reciting the limitations of "obtaining a first transformed version of the configuration information" and "transforming the first transformed version of the configuration information using user input to obtain a second transformed version of the configuration information". However, Brandl converts the general recipe to a master recipe based on site information. There is no further conversion of the master recipe. As pointed out by the Office Action, Brandl, C33:55-65; 41:64 – 42:24, describes various choices that the user can input. However, these user inputs are used to influence the optimization procedure that converts the generic recipe into a site specific master recipe. There is no additional transformation of the master recipe. Therefore, Brandl does not describe two translations of configuration information, as required by independent claim 1. Further, Moore fails to cure this deficiency of Brandl.

For the reasons described above, neither Brandl nor Moore, separately or in combination disclose all of the limitations of independent claim 1. Thus, independent claim 1 is allowable over the cited art. For similar reasons, independent claims 43 and 44 are also allowable over the cited art. Claims 2-42 and 26 depend from allowable independent claim 1, and are therefore also allowable.

III. Conclusion

For the reasons discussed above, all pending claims are allowable over the cited art. Reconsideration and allowance of all claims is respectfully requested.

Respectfully submitted,

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